

AARON D. FORD
Attorney General
Jaimie Stilz (Bar No. 13772)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101-1068
(702) 486-3130 (phone)
(702) 486-2377 (fax)
JStilz@ag.nv.gov
Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

XIAO YE BAI,

Petitioner,

vs.

STATE OF NEVADA, *et al.*,

Respondent(s).

Case No. 2:20-cv-02042-KJD-NJK

**MOTION FOR ENLARGEMENT OF TIME
TO FILE REPLY IN SUPPORT OF MOTION
TO DISMISS (ECF NO. 53)**

(FOURTH REQUEST)

Respondents move this Court for an enlargement of time of 4 days from the current due date of March 24, 2022, up to and including March 28, 2022, in which to file their Reply in Support of the Motion to Dismiss (ECF No. 53). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the fourth enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: March 24, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Xiao Ye Bai v. State of Nevada, et al.*, Case No. 2:20-cv-02042-KJD-NJK, and as such, have personal knowledge of the matters contained herein.

2. This is my fourth request for an extension to file the Reply in Support of the Motion to Dismiss (ECF No. 53), and this Motion is made in good faith and not for the purpose of delay.

3. The Reply is currently due on March 24, 2022.

4. I am unable with due diligence to timely complete the Reply herein. I am still dealing with pressing medical/health issues. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Reply in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. Based on the foregoing, I respectfully request an enlargement of time of 4 days, up to and including March 28, 2022, to file the Reply in Support of the Motion to Dismiss (ECF No. 53).

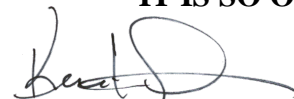
I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of March, 2022.

/s/ Jaimie Stilz

Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: March 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 24th day of March, 2022, I served a copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS (ECF NO. 53)**, by U.S. District Court CM/ECF electronic filing, to:

Ron Y. Sung
Assistant Federal Public Defender
411 E. Bonneville Ave., Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577
Ron_Sung@fd.org

/s/ J. Stilz
An employee of the Office of the Attorney General